

FairLaw Firm

INVOICE

Open (Not Sent)

Invoice # 560

Invoice Date: 12/19/2023

Due Date:

Amount due
10,872.00

To:
Courtney Mcleod
[REDACTED]

FairLaw Firm
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Services

Date	Staff Member	Category	Description	Duration	Total
8/22/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze corporate documents on Sunbiz and compare with Chef Creole's websites and client's timesheets to make sure the correct entity is being sued.	0.30	105.00
8/22/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft summonses for both Defendants.	0.40	140.00
8/22/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft complaint against correct corporate entity, Chef Creole Inc.	0.50	175.00
8/22/2022	Bridget Obando	Draft/review	Draft Civil Cover Sheet, finalize complaint, and summons. File case then audit and update case file.	0.40	60.00
8/22/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze Clerk's notice of Judge Assignment.	0.10	35.00
8/23/2022	Brian H. Pollock Esq.	Draft/review	Drafted letter to client in regards to preserving evidence	0.30	150.00
8/23/2022	Brian H. Pollock Esq.	Draft/review	Drafted letter to client in regards to case being refiled in Federal Court	0.30	150.00
8/25/2022	Bridget Obando	Receipt, Review, and Analysis	Receive and send issued summons to process server for service and update file.	0.20	30.00
8/26/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analzye ECFs 2,3,4 and 5.	0.60	210.00
9/14/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft statement of claim.	0.90	315.00
9/15/2022	Toussaint M. Cummings, Esq.	Draft/review	Drafted letter to client re statement of claim	0.40	140.00
9/19/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Phone call with client.	0.20	70.00
9/21/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Phone call with Nathaly Saavedra.	0.30	105.00
9/21/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Email to process server providing address.	0.10	35.00
9/21/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Email to client.	0.10	35.00
9/22/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Read and repsond to emails from process server re service on Sejour.	0.20	70.00
9/22/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Read and respond to email from Nathaly re litigation strategy.	0.20	70.00
10/13/2022	Bridget Obando	Receipt, Review, and Analysis	Receipt, review, and update case file on return of service.	0.20	30.00
10/13/2022	Bridget Obando	Draft/review	Draft and file notice of filing return of service on defendant Chef Creole.	0.20	30.00
	Toussaint M.	Employment			

10/28/2022	Toussaint M. Cummings, Esq.	Employment Litigation Plaintiff	Draft Response to Order to Show Cause at ECF No. 8.	0.70	245.00
10/28/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft Clerk's Default and Motion for Entry of Clerk's Default.	0.40	140.00
10/28/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze Order to Show Cause at ECF 8.	0.10	35.00
10/28/2022	Toussaint M. Cummings, Esq.	Employment Litigation Plaintiff	Analyze Entry of Clerk's Default at ECF 11.	0.10	35.00
10/28/2022	Bridget Obando	Email Communication	Email exchange regarding order to show cause.	0.20	30.00
10/28/2022	Bridget Obando	Phone Call	Phone call to chambers regarding order to show cause.	0.10	15.00
10/29/2022	Toussaint M. Cummings, Esq.	Draft/review	drafted letter to defendant with enclosed default	0.10	35.00
10/31/2022	Shakira Brizuela	FLSA - Plaintiff	Drafted Motion for Default Final Judgment, Proposed Order for Final Judgment, Proposed Final Judgment, and Client's Declaration of Indebtedness.	2.40	360.00
11/4/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Phone call from J. Moore's chambers re: clerk's default.	0.10	35.00
11/7/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze paperless notice to file motion for final judgment.	0.10	35.00
11/8/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Review and revise Motion for Entry of Final Judgment and Declaration for Indebtedness.	0.80	280.00
11/9/2022	Shakira Brizuela	FLSA - Plaintiff	Complied Google reviews as Exhibit D for Motion for Final Judgment.	0.20	30.00
11/11/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Phone call to client.	0.10	35.00
11/15/2022	Bridget Obando	Receipt, Review, and Analysis	Receipt and review return of non-service.	0.20	30.00
12/19/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze Order at ECR 14 denying motion for final default judgment.	0.20	70.00
12/21/2022	Shakira Brizuela	FLSA - Plaintiff	Researched case law on when employer's willfully violate the flsa.	0.70	105.00
12/21/2022	Shakira Brizuela	FLSA - Plaintiff	Met with attorneys to discuss amending motion for final default judgment	0.50	75.00
12/22/2022	Shakira Brizuela	FLSA - Plaintiff	Drafted MET to filed amended Mtn for Default Final Judgment	0.70	105.00
12/22/2022	Shakira Brizuela	FLSA - Plaintiff	Filed MET to Amend Mtn for Final Default Judgment	0.10	15.00
12/22/2022	Shakira Brizuela	Receipt, Review, and Analysis	Reviewed images of conversations sent by client and saved to client file.	0.40	60.00
12/22/2022	Shakira Brizuela	FLSA - Plaintiff	researched gap time wage cases in Florida	0.60	90.00
12/23/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze paperless order at ECF 16 denying motion for extension of time	0.10	35.00

	Toussaint M. Esq.				
12/23/2022	Cummings, Esq.	FLSA - Plaintiff	Analyze and revise amended motion for extension of time.	0.20	70.00
12/28/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft Amended Motion for Default Judgment Parts A-C.	1.30	455.00
12/28/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze case law in Order denying motion for default judgment.	0.60	210.00
12/28/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft Amended Declaration of Indebtedness.	0.60	210.00
12/28/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Discussion with Shakira re: revision of motion for default and declaration.	0.30	105.00
12/28/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze Chef Creole website for factual information to include in motion for default.	0.20	70.00
12/29/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft Amended Motion for Default Judgment Parts D-E.	1.50	525.00
12/29/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Revise Amended Declaration of Indebtedness based on conversation with client.	0.20	70.00
12/29/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Phone conversation with client.	0.10	35.00
12/29/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft Amended Proposed Order for Final Judgment.	0.30	105.00
12/29/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Draft Amended Proposed Final Judgment.	0.10	35.00
12/29/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Revise calculations for Plaintiff's statement of claim to include in Amended Motion for Final Default Judgment.	0.20	70.00
12/29/2022	Toussaint M. Cummings, Esq.	FLSA - Plaintiff	Analyze case law to cite in memorandum of law in amended motion for final judgment.	0.60	210.00
1/27/2023	Adrian Castillo	Phone Call	Phone call to Mr. Mcleod in order to provide him with an update. Reviewed docket, case is currently pending order on Motion to Default. Mr. Mcleod understood and will follow up within 45 days if we don't reach out to him before hand.	0.30	52.50
3/27/2023	Bridget Obando	Phone Call	Phone call with client.	0.20	30.00
4/3/2023	Toussaint M. Cummings, Esq.	Draft/review	Drafted notice of 90 days Re: Motion for final judgment	0.20	75.00
4/13/2023	Toussaint M. Cummings, Esq.	Phone Call	Phone call with client.	0.10	37.50
4/13/2023	Toussaint M. Cummings, Esq.	Email with Client	Follow up email to client.	0.10	37.50

5/23/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze paperless order at ECF 21 denying motion for default judgment.	0.20	75.00
5/23/2023	Toussaint M. Cummings, Esq.	Email Communication	Email process server re: serving defendant correctly.	0.10	37.50
5/24/2023	Toussaint M. Cummings, Esq.	Email Communication	Read and respond to emails from process server.	0.40	150.00
5/26/2023	Bridget Obando	Receipt, Review, and Analysis	Receipt issued summons and email to process server.	0.20	30.00
6/30/2023	Toussaint M. Cummings, Esq.	Draft/review	Draft Motion for Entry of Clerk Default.	0.20	75.00
6/30/2023	Toussaint M. Cummings, Esq.	Phone Call	Phone call to client .	0.10	37.50
7/4/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze Clerk's Default at ECF No 26.	0.10	37.50
7/6/2023	Toussaint M. Cummings, Esq.	Receipt, Review, and Analysis	Analyze paperless order at ECF 27.	0.10	37.50
7/20/2023	Toussaint M. Cummings, Esq.	Draft/review	Revise motion for default judgment by including additional exhibits, case law, and facts to support argument.	2.10	787.50
7/20/2023	Toussaint M. Cummings, Esq.	Draft/review	Draft letter to defendant advising of clerk's default.	0.40	150.00
8/25/2023	Toussaint M. Cummings, Esq.	Draft/review	draft N/Dissociation of Counsel	0.20	75.00
8/29/2023	Luna Alvey Esq.	FLSA - Plaintiff	Review case regarding status and next steps to take.	0.30	120.00
9/1/2023	Luna Alvey Esq.	Document/File Management	Review file/docket for entry of final judgment.	0.10	40.00
9/27/2023	Steffany Sanguino	Paralegal	File review.	0.10	16.50
10/18/2023	Luna Alvey Esq.	FLSA - Plaintiff	Telephone call with client regarding status/default.	0.10	40.00
10/18/2023	Luna Alvey Esq.	FLSA - Plaintiff	Review case and docket for status.	0.10	40.00
11/6/2023	Luna Alvey Esq.	FLSA - Plaintiff	Draft final judgment.	1.00	400.00
11/6/2023	Luna Alvey Esq.	FLSA - Plaintiff	Draft notice of filing proposed final judgment.	0.20	80.00
12/7/2023	Steffany Sanguino	Paralegal	I got a call from the clerk, Stephanie, about our Motion for Default.	0.20	33.00
12/12/2023	Brian H. Pollock Esq.	Receipt, Review, and Analysis	Receipt and review of Order on Second Motion for DFJ (Granted in part - the good part)	0.70	350.00
12/15/2023	Brian H. Pollock Esq.	Draft/review	Draft email to Mr. McLeod enclosing the Order Granting our Motion and what it means	0.20	100.00
12/19/2023	Brian H.	Draft/review	Draft M/Fees and review time records for same before filing it	1.30	650.00

12/19/2023	Brian H. Pollock Esq.	Draft/review Pollock Esq.	Draft MTC Fact Info Sheet from Defendant, Chef Creole, Inc., the proposed Fact Information Sheet, and the proposed Order Granting Same	0.80	400.00
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Services Subtotal: 10,014.50

Expenses

Date	Vendor	Category	Description	Total
8/22/2022	FairLaw Firm	Federal Litigation - Plaintiff	Complaint filed in Federal Court.	402.00
10/13/2022	FairLaw Firm	Affidavit of Service	Affidavit on Return of Service for Chef Creole Miami PSPI #2022001349	227.20
10/29/2022	FairLaw Firm	Postage	sent out clerk default	0.57
10/29/2022	FairLaw Firm	Postage	sent out mtn for default	0.57
11/15/2022	FairLaw Firm	Affidavit of Service	Return of Non-service.	137.20
12/29/2022	FairLaw Firm	Postage	sent out amended mtn for final judgment to dfts	2.16
4/3/2023	FairLaw Firm	Postage	sent out 90 day notice to dfts	0.60
5/31/2023	FairLaw Firm	Affidavit of Service	Affidavit on Return of Service for Chef Creole Miami PSPI -2023000957	87.20

Expenses Subtotal: 857.50

Total: 10,872.00